

EXHIBIT A

**ZHP00076708-ZHP00076709 - Documents were
designated confidential and will be provided separately
to Counsel and the Court**

EXHIBIT B

From: Adam Slater <ASlater@mazieslater.com>
Date: April 23, 2021 at 6:16:13 PM EDT
To: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>, "Priselac, Jessica" <JPriselac@duanemorris.com>
Cc: Christopher Geddis <CGeddis@mazieslater.com>, Cheryll Calderon <ccalderon@mazieslater.com>, "George T. Williamson" <gwilliamson@farr.com>, Layne Hilton <l.hilton@kanner-law.com>
Subject: B. Chen

Counsel:

Please advise as to whether you will agree to production of Baohua Chen's custodial file within 10 days. Plaintiffs believe that this is a reasonable request, including based on testimony provided by Min Li this past week. If not, we can add to the agenda for this week's conference. If you would like to confer on this request please advise of times on Monday when you are available. Due to the time limitations we do intend to raise this issue at Wednesday's conference if not agreed by then.

Chris has advised us of the meet and confer earlier today. Plaintiffs cannot agree to a briefing schedule on the motion you described during the call, specifically that you want to first file a motion for a protective order to preclude the deposition of Mr. Chen in June. We believe the motion would need to be filed and heard in advance of the scheduled deposition date.

With regard to the date of the deposition, as discussed on the call today, we need to move the date as the deposition is currently scheduled to begin on May 31, 2018, which would necessitate all counsel working through Memorial Day weekend. As communicated, we request rescheduling to begin either on June 3 or June 7 (eastern time).

Please advise.

Adam M. Slater

Certified as a Civil Trial Attorney
By the Supreme Court of New Jersey

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EXHIBIT C



FARR LAW FIRM

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April 24, 2021

Seth A. Goldberg
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103

Re: ZHP Document Production

Dear Mr. Goldenberg:

Plaintiffs have obtained information through the course of the ZHP witness depositions which makes clear that certain sources of highly relevant information have not been produced. The following is a list of items Plaintiffs request that Defendants search and produce:

1. Production of custodial files for all parties to the July 27, 2017 email (ZHP00190573):
 - a. Jinsheng LIN
 - b. Jucai GE
 - c. Tianpei HUANG
 - d. Wangwei CHEN
 - e. Wenquan ZHU
 - f. Wenbin CHEN
 - g. Min LI
 - h. Peng DONG
 - i. Lihong LIN
 - j. Yanfeng LIU
 - k. Peng WANG
 - l. Wenling ZHANG
2. Production of the custodial file for Xiaofang (Maggie) Kong.
3. The addition of the following search terms to be searched across all custodians:
 - a. Zhejiang Second Pharma
 - b. CN103613558A

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- c. Impurity K
 - d. NALCO
 - e. Hypochlorite
- 4. Documents related to [REDACTED]
[REDACTED] (see ZHP02636960).
- 5. All copies, including drafts, of the report identified at tab 3, row 54 of ZHP01391683, wherein it indicates that “[a]fter discussion with Li, the project was not updated because the impurities involved were sensitive.”
- 6. Production of custodial files for individuals involved in the testing, drafting, and preparation of above-reference report, including but not limited to:
 - a. Huang Tianpei
 - b. Li Dan
- 7. [REDACTED]
[REDACTED] (see ZHP01838590, ZHP02333049).
- 8. Plaintiffs request unredacted copies of ZHP01838590 and ZHP02333049 with working document hyperlinks.
- 9. Emails authored, sent, or received by Peng Dong prior to December 12, 2017.
- 10. Litigation hold letters sent to all custodians including records demonstrating what devices were subject to the litigation hold for each custodian.
- 11. Records identifying the process by which the collection of devices and data was carried out pursuant to the litigation hold, including when performed and by whom.
- 12. All records, including personnel files if necessary, associated with broken company issued cell phones and/or laptop computers for all custodians, including the date of occurrence and when and how the device was replaced, and location and status of the broken device. This includes, but it not limited to:
 - a. Complete documentation associated with Min Li’s broken Lenovo ThinkPad and Samsung Phone, including when the devices were rendered unusable, what steps were taken to retrieve information from the devices, what information was recovered from the devices and what information was destroyed, onto what device the recovered information was transferred and on which date the transfer occurred, and the location and status of the broken devices.

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13. Emails, notes, calendar entries, and meeting minutes from internal ZHP meetings for all custodians associated with the discovery of NDMA in ZHP's sartans. This includes but is not limited to:

- a. The approximately 5-9 meetings Min Li attended with Baozhen Chen;
- b. QC department meetings organized or attended by Qiangmin Li.

14. All records associated with the March 12, 2018 [REDACTED]

15. The [REDACTED] (PRINSTON0075797) [REDACTED]

[REDACTED] To the extent you claim it has already been produced, please affirmatively identify the Bates ranges for such testing.

Plaintiffs are available to meet and confer regarding these requests on Monday, April 26. It should come as no surprise to you that there is urgency to these requests in light of the upcoming ZHP depositions. Accordingly, if you are unable to meet and confer on Monday regarding this matter, Plaintiffs intend to place this issue on the agenda for the Court's April 28, 2021 discovery conference.

If you have any questions or concerns regarding the above information, please do not hesitate to contact my office.

Respectfully,



George T. Williamson
For the Firm

GTW/jb